

August 3, 2004

Marlene H. Dortch, Office of the Secretary
Federal Communications Commission
445 12th St. SW
Washington, DC 20554

Re: CC Docket Number 96-45;FCC 04-127

Dear Ms. Dortch:

On behalf of the members of the American Congress on Surveying and Mapping (ACSM), I am writing to you to comment on the recommendations of the Joint Board on Universal Service regarding the designation of eligible telecommunications carriers in rural areas of the country. We feel that the recommendations of the Joint Board should not be adopted unless they can be accomplished without causing a financial burden on small businesses in rural communities.

Upon review of the recommendations of the Joint Board, it appears that this is primarily a telecommunications issue. However, I would like to point out that if the recommendations are adopted, as written, they will have a detrimental effect on small businesses, including our members in rural western and southern states as well as Alaska.

Affordability

Like most small businesses, our small business members depend on multiple telecommunications lines. They have a primary office phone line (perhaps two or three lines); they also have one or more fax and dial-up internet lines. Additionally, they have one or more cellular phones. If the Joint Board's recommendations are accepted, the monthly cost of these additional --- and necessary --- phone lines will be more than many of our members can afford.

Safety

In the surveying industry, surveyors are often working in remote areas where the only mode of communication is a cellular phone. If they can not afford a cellular phone because of the high cost of an additional phone line, many of these surveyors will be left working in remote and often hazardous areas without any means of communication in the event of an emergency. If the Joint Board's recommendations are accepted, many surveyors will be forced to choose between a primary office landline or a cellular phone. It is likely that many will choose the office line and forego the cellular phone, thus leaving them unprotected when working in remote areas.

Unfair Competition

Under the Joint Board's recommendations, including the primary line restriction, rural businesses would be at a severe competitive disadvantage to their urban counterparts. They will be unfairly charged more for basic telecommunications services. If the Joint Board's recommendations are accepted, urban businesses will have a significant business advantage over rural businesses.

On behalf of our members, I ask that as you review the Joint Board's recommendations you keep in mind the disadvantages the recommendations will place on small businesses in rural areas. I am available to answer any questions you may have, or to provide additional information.

Sincerely,

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